## Date:

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12<sup>th</sup> Street, SW
Washington, DC 20554



Re: EB Docket No. 06-36, Certification of CPNI Filing 2006

Dear Ms. Dortch:

This letter serves as our "Certification of CPNI Filing 2006", as ordered in EB Docket No. 06-36.

Company Name(s): Hutchinson Telephone Company
Hutchinson Telecommunications Inc

Address 235 Franklin St. SW Box 279

City, State Hutchinson, MN. 55350

As a corporate officer of these companies, I hereby certify that, based on my personal knowledge, the Companies have established operating procedures that are adequate to ensure compliance with the rules established by the Federal Communications Commission ("FCC") concerning Customer Proprietary Network Information" ("CPNI"), as set forth in Part 64, Subpart U, of the FCC's Rules and Regulations, 47 C.F.R. § 64.2001 *et seq.*, as revised.

The attached Statement demonstrates such compliance.

Company Officer

Dated: 2-3-06

## Attachment

cc: Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau, Federal Communications Commission, Room 4-A234, 445 12<sup>th</sup> Street, SW, Washington, DC 20554
Best Copy and Printing, Inc., Portals II, 445 12<sup>th</sup> Street, SW, Washington, DC 20554

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## STATEMENT

The operating procedures of Hutchinson Telephone Company are designed to ensure compliance with the CPNI rules applicable to them. Such procedures are as follows.

Our company has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. Each customer's record contains a designation identifying whether or not we have obtained, through the processes permitted by the FCC's rules, the customer's approval to use, disclose or permit access to his or her CPNI.

Our company trains its personnel as to when they are, and are not, authorized to use CPNI, and we have an express disciplinary process in place if the rules are violated.

Our company maintains a record of our own and our affiliates' sales and marketing campaigns that use customer CPNI. We also maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. We maintain these records for at least one year.

Our company has a supervisory review process regarding our compliance with the FCC's CPNI rules for any outbound marketing efforts, and maintains records of our compliance for at least one year. We require sales personnel to obtain supervisory approval of any proposed marketing request for customer approval

Our company is prepared to provide the FCC with written notice, within five business days of any instance where the "opt out" mechanisms do not work properly.